

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Michael L. Jones

Plaintiff

v.

1. Thomas Carroll (THE WARDEN)
 2. David Pierce (Deputy Warden)
 3. David Holman (Security Superintendant)
 4. Karen Hawkins (STAFF Lieutenant)
 5. Raynard Jones (Co-cpl/Sgt)
 6. Ardeey Evans (Cpl)
 7. Keshaw Travies (Sgt)
 8. Larry Savage (Lieutenant)
 9. Floyd S. Dixon (Bureau of Prisons chief)
- individually and in their official capacity.
Defendants

MOTION FOR APPOINTMENT
OF COUNSEL
Civil Action No. 07-791



Pursuant to 28 U.S.C. § 1915(e)(1) plaintiff moves for an order appointing counsel to represent him in this case. In support of this motion, plaintiff states:

1. Plaintiff is unable to afford counsel. He has requested to leave to proceed *in forma pauperis*.
2. Plaintiff's imprisonment will greatly limit his ability to litigate. The issues involved in this case are complex, and will require significant research and investigation. Plaintiff has limited access to the law library and limited knowledge of the law. Also Plaintiff is housed in the Security Housing Unit the most restrictive housing unit in the state of Delaware and Law Library correspondence is only through mail which takes weeks and all Library request are not approved.

3. A trial in this case will likely involve conflicting testimony, and counsel would better enable plaintiff to present evidence and cross-examine witnesses.

4. Plaintiff has made repeated efforts to obtain a lawyer attached to this motion and some letters I received back from some lawyers I wrote. But without money they will not represent plaintiff.

WHEREFORE, plaintiff request that the court appoint a member of the Delaware state Bar as counsel in this case.

Michael J. Jones
11-1-07

Michael Jones #417267
1131 Paddock Rd D.C.C.
Smyrna Del. 19777

LAW OFFICES OF
BARROS, McNAMARA, MALKIEWICZ & TAYLOR, P.A.
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306 E. Stein Highway
Seaford, DE 19973
Telephone: 800-734-LAWS (5297)

Please respond/fax to our Dover office only

August 28, 2007

I/M Michael L. Jones
S.B.I. #417267
Delaware Correctional Center
SHV-Bldg. 17-D-Upper 8
1181 Paddock Road
Smyrna, DE 19947

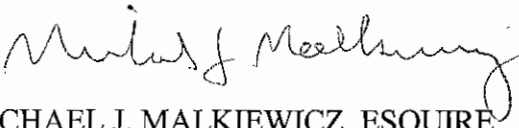
LEGAL
CORRESPONDENCE

Mr. Jones:

My law firm will not represent you in the District Court case that you wrote to us about in a letter dated August 16, 2007. We wish you success in your case.

Sincerely,

BARROS, McNAMARA, MALKIEWICZ
& TAYLOR, P.A.


MICHAEL J. MALKIEWICZ, ESQUIRE

MJM/sep
P:\SEP\jones.lt.dcc.wpd



THE
LYONS
LAW
FIRM

April 19, 2007

Edmund Daniel Lyons
David J. Lyons
Attorneys at Law

Mr. Michael Jones
1181 Paddock Road
Smyrna, DE 19977

Dear Mr. Jones:

I am in receipt of your letter of April 16, 2007. I am unable to help you at this time. Please contact Community Legal Aid for assistance.

Very truly yours,

David J. Lyons
DJL/das

.....
1526 Gilpin Avenue
P.O. Box 579
Wilmington, DE 19899
Phone: 302 777.5698
Fax: 302 777.5051
www.lyonslaw.com

David D. Finocchiaro, L.L.C.
Attorneys at Law

David D. Finocchiaro, Esquire
421 Smyrna Clayton Blvd.
Smyrna, Delaware 19977

Telephone: (302) 653-5091
FAX: (302) 653-5093

August 27, 2007


I/M Michael Jones
SBI # 417267
Delaware Correctional Center
SHU Building 17 D Upper 8
1181 Paddock Road
Smyrna, DE 19977

Dear Mr. Jones:

Thank you for your letter of August 16, 2007 seeking representation. Unfortunately, I am unable to take this case at this time. I do wish you the best of luck with your case.

Thank you.

Very truly yours,



David D. Finocchiaro

DDF/blb

PENNSYLVANIA INSTITUTIONAL LAW PROJECT

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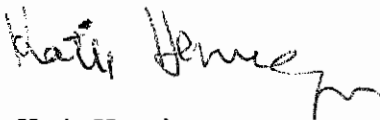
July 12, 2007

Michael Jones
417267
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977

Dear Mr. Jones:

I am in receipt of your recent letter. I regret to inform you that our Projects funding guidelines prohibit us from handling cases outside the state of Pennsylvania; therefore, we are unable to assist you in this matter. Good luck.

Sincerely,

A handwritten signature in black ink, appearing to read "Katie Henninger", with a stylized flourish at the end.

Katie Henninger
Legal Assistant